

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

CR. NO. 03-10356-MLW

FREDERICK A. SIMONE (1)
A/K/A FREDDY, A/K/A THE NEIGHBOR
Defendant.

**DISMISSAL OF DEFENDANT FREDERICK A. SIMONE FROM COUNTS
ONE, TWO, THREE, SIX, TEN THROUGH TWENTY-SIX, THIRTY-NINE, AND
THE FORFEITURE ALLEGATIONS**

Pursuant to FRCP 48(a), the United State Attorney for the District of Massachusetts, Michael J. Sullivan, hereby dismisses the defendant FREDERICK A. SIMONE, from Counts One, Two, Three, Six, Ten through Twenty-Six, Thirty-Nine and the Racketeering Forfeiture Allegations and the Money Laundering Forfeiture Allegations of the Indictment which charge him with RICO, conspiracy to extort (Hobbs Act), extortion, interstate travel in aid of racketeering, extortionate extensions of credit, collection of extortionate extensions of credit, conspiracy, and conspiracy to launder money in violation of 18 U.S.C. §§ 1962, 1951, 1952, 892, 894, 371, and 1956. In support of this dismissal, the government states that, pursuant to a plea agreement, defendant FREDERICK A. SIMONE has

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pleaded guilty and has been sentenced on Counts Four and Five of the Indictment, and the dismissal is in the interest of justice.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By:

HEIDI E. BRIEGER
ERNEST S. DiNISCO
Assistant U.S. Attorneys

Leave to File Granted:

Mark L. Wolf
MARK L. WOLF
United States District Court Judge

June 24, 2005